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DECLARATION OF JOHN G. PETERSON

I, John G. Peterson, hereby depose and state:

1. I am an attorney licensed to practice law in the State of California. I am counsel for the Church of Scientology of California in the instant case. I am also specially admitted in the Portland, Oregon case of Julie Christofferson-Titchbourne v. Church of Scientology of California, et al. Circuit Court of the County of Multnomah, case #A7704-05184.

2. Currently the transcripts from the Christofferson case proceedings are unavailable as they are limited in distribution by the order of the Oregon court during the duration of the trial. Actions will be undertaken shortly to obtain the release of these transcripts so that they may be presented to this Court. However at this time this important information must be presented to the Court in the form of an affidavit from a direct witness to the proceedings.

3. Gerry Armstrong is a witness in the Christofferson case and I have been present during the last several days of his cross-examination. During the course of this cross-examination several matters have come to light which are of considerable relevance to this case and it is the purpose of this affidavit to bring these matters to the attention of the Court.

4. Gerry Armstrong has directly admitted to committing perjury in at least two sworn affidavits.

5. Gerry Armstrong has admitted his involvement in a scheme to plant false, created documents in Church of Scientology files in order to discredit an investigation by the

1 Church into Michael Flynn and Flynn's involvement in the forgery
2 of a \$2,000,000.00 check written on the account of L. Ron
3 Hubbard.

4 6. Gerry Armstrong has admitted his active participation
5 in a scheme to overthrow the current Church of Scientology
6 leadership in order to install in their place individuals who
7 would engineer a "global settlement" of the Church litigation
8 with Michael Flynn, including Armstrong's \$60,000,000.00
9 counterclaim against the Church. In furtherance of this scheme,
10 Armstrong proposed a program to set up an executive of Author
11 Services Incorporated with a woman and use the resulting upset
12 in the individual's marriage and status as a means to blackmail
13 the individual.

14 7. Gerry Armstrong also admitted that he advised his
15 co-conspirators that a lawsuit could be brought to throw the
16 Church into receivership and that this could be done without
17 supporting evidence but merely by including alarming allegations
18 in the pleading and that such allegations did not need to be
19 backed up by evidence.

20 8. These are only a few of the statements of Armstrong
21 brought out during his cross-examination which are of relevance
22 to this proceeding. Also the above statements are supported by
23 a videotape of Gerry Armstrong admitting to these plans to
24 destroy the Church of Scientology.

25 9. In the case in Oregon, Homer Schomer testified that he
26 had committed perjury in the Armstrong case before Judge
27 Breckenridge. Judge Londer, in Oregon instructed counsel to
28 send a copy of the transcript of this testimony to this Court,

1 despite the fact that the transcripts of the Christofferson case
2 have been sealed by Judge Londer. A copy will be submitted
3 shortly.

4 Sworn to under the pains and penalty of perjury this ____th
5 day of April, 1985.

6 Executed at _____.

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10 John G. Peterson, Esq.

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